

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
Federal-State Joint Board on)	CC Docket No. 96-45
Universal Service)	
)	
Forward-Looking Mechanism)	CC Docket No. 97-160
for High Cost Support for)	
Non-Rural LECs)	

REPLY COMMENTS OF AMERITECH ON
FURTHER NOTICE OF PROPOSED RULEMAKING

I. INTRODUCTION

Ameritech files its Reply Comments responding to comments made on the Commission's Further Notice of Proposed Rulemaking (FNPRM) regarding forward-looking input values to be used in the "synthesis" model, as well as alternative approaches for determining the many input values to be used in the platform model. Because of the short time since comments on the FNPRM were filed, Ameritech will focus on three topics. First, Ameritech will generally concur with the comments questioning the proposed input values to the criteria established by the Commission in paragraph 250 of its Universal Service Order.¹ Second, it will refute a claim that the Commission should impose an additional, asymmetrical reporting requirement on incumbent LECs. Third, Ameritech will refute misunderstandings, and improper and incorrect claims regarding information provided by Ameritech in this proceeding.²

¹ Report and Order, CC Docket 96-45, released May 8, 1997 with errata released on June 4, 1997.

² See, Comments of AT&T Corp. and MCI WorldCom, Inc., Public Version and Proprietary Version, filed July 23, 1999 and refiled Public Version on July 26, 1999 with corrections of defective copies.

II. THE REVIEW PROCESS

Many parties criticized various proposed inputs in their comments. These criticisms, for the most part, rely explicitly upon the Commission's own ten criteria.³ These concerns regarding the accuracy of inputs are generally consistent with or are logical extensions of Ameritech's analysis and comments. In particular, Ameritech shares GTE's frustration with attempting to review PNR's data to determine whether it satisfies the Commission's eighth criterion found at paragraph 250 in the Universal Service Order:

- (8) The cost study or model and all underlying data, formulae, computations, and software associated with the model must be available to all interested parties for review and comment. All underlying data should be verifiable, engineering assumptions reasonable, and outputs plausible. *[footnote omitted]*

GTE concluded that all of the PNR data should be rejected, and not used in the synthesis model, in part, because the PNR data has not been available for review.⁴

Although, Ameritech shares GTE's experiences, it has come to a different conclusion than GTE. That is not to say, Ameritech has not reviewed data that GTE has not seen. Rather, Ameritech has only seen PNR data provided on the CDs produced by PNR and subject to the Commission's proprietary order.⁵ But using that data, Ameritech was able to review some of the input for areas served by Ameritech, and concluded that the data appears to be reasonable, subject to the various qualifications that Ameritech made in its July 23th Comments.

³ See, e.g., GTE's Comments at pages 36-37, and U S WEST's Comments at pp. 6-14.

⁴ GTE's Comments, p 37.

⁵ See, the ex parte letter of William M. Neuman to Ms. Magalie Roman Salas, filed February 10, 1999 for a description and availability of PNR's customer location data on CDs.

Still, Ameritech has many questions about the PNR data for which answers are currently unknown. Notwithstanding the legitimate concerns expressed by GTE, Ameritech concludes that although the PNR data, is imperfect, it is the best customer location information currently available in this proceeding.⁶ Nevertheless, if the Commission decides to pursue the synthesis model as part of the federal mechanism to provide high cost support,⁷ the uncertainties and incompleteness regarding customer location information must be adequately resolved.

III. LOCATION SPECIFIC DATA

AT&T and MCI WorldCom (at page 4) recommend that the Commission require incumbent LECs to provide accurate customer location or service address information that can be used to enhance the percent of locations successfully geocoded. In fact, AT&T and MCI WorldCom suggest at (pages 4 and 5) that the Commission “could condition an incumbent LEC’s privilege of drawing upon the universal service fund on its provision of comprehensive customer location information which would allow PNR to generate accurate geocode points for all customers within the incumbent LEC’s service area, rather than allowing the incumbent LEC to draw on universal service funds for customer locations that it refuses to identify.”

This proposal should be rejected because it is unnecessary, administratively burdensome, discriminatory and proposes an unnecessarily harsh remedy that may exceed the Commission’s jurisdiction. At a minimum, if the proposal adapted the synthesis model would need to be

⁶ See Ameritech’s Comments at pp. 2-4.

⁷ For example, *Texas Office of Public Utility Counsel, vs. FCC*, No. 97-60421 (5th Circuit, 1999) may require modifications to the Commission’s proposed mechanism.

modified to reflect the additional cost of providing this information. In addition, if this requirement is restricted to just incumbent LECs, it is discriminatory and has anticompetitive and asymmetric effects. Hence, if the Commission were to adopt this proposal in spite of its likely significant administrative burden, it must apply it to all eligible telecommunication carriers, not just incumbent LECs. Finally, the Commission's authority to add conditions beyond those included in Section 214(e) of the 1996 Act is questionable.

IV. AMERITECH DATA

AT&T and MCI WorldCom at pages 13-15 of their comments claim that there are various shortcomings in the Commission Staff's analysis of underground, buried, and aerial copper cable costs. In particular, they claim that defects in the RUS data ultimately produce "systematically anomalous results" when used in the synthesis model. Next, they claim at page 15 that copper cable cost data submitted by incumbent LECs, such as Ameritech, are even worse. Specifically, they claim that they have found no link between the incumbent LECs' contract data and their proposed costs. Along the same lines, in their proprietary Exhibit A, Copper Cable Costs, at page 3, they apparently claim that Ameritech has not submitted actual installed copper cable costs, because Ameritech's installed costs rely on the use of "Loop Installation Factors" to convert from material costs to installed costs.

Ameritech has also found serious shortcomings in the Staff's analysis of underground, buried, and aerial copper cable costs, and various problems associated with using the RUS data contribute to the inaccuracies of the Staff's analysis. However, the characterization of cable cost information submitted in this proceeding by Ameritech as "even worse" is disingenuous. The

information submitted by Ameritech regarding material and installed costs for copper cable in this proceeding is accurate.

First, AT&T and MCI WorldCom did not provide sufficient information in their comments to permit Ameritech to know the specific Ameritech copper cable cost information upon which they relied. Given the brevity of their comments and the analysis they provide in Exhibit A and the short cycle time for reply comments, Ameritech must presume that copper cable costs were obtained from information contained in the state-sponsored universal cost studies submitted for Ameritech's serving areas in Illinois and Michigan.⁸ In addition, Ameritech is unaware of any extraordinary request from AT&T and MCI WorldCom to Ameritech "to provide a logic-trail showing the link between their [Ameritech's] actual contract costs and the spreadsheet entries they submitted to the Commission."⁹ Consequently, these gratuitous remarks by AT&T and MCI WorldCom should be disregarded with respect to Ameritech, since the copper cost data submitted in these states-sponsored studies do satisfy the criteria found in paragraph 250 of the Commission's Universal Service Order, and should be used to evaluate any proposed copper cable costs input values.

⁸ This information was made available to AT&T and was inspected by AT&T at Ameritech's Washington office subject to the Commission's protective order.

⁹ See AT&T's and MCI WorldCom's Comments at p. 15. The reference to spreadsheet entries submitted to the Commission could refer to Ameritech's response to the Common Carrier Bureau's (CCB's) "Request for Data on Outside Plant Structure and Cable," issued December 15, 1998. While the CCB requested that the components of cable costs be identified for outside plant jobs in specific Ameritech wire centers, Ameritech was unable, in the time allotted to respond to the data request, to provide this detail. Specifically, the initial capital outlay for the physical material of the cable itself was not provided in Ameritech's response. Ameritech has received no inquiry from AT&T and MCI WorldCom requesting this detail, which would be a necessary step to link this cost information to vendors' prices for standard copper cables. Finally, the total installed costs included in Ameritech's response did not rely on using "loop installation factors" in their development.

Second, AT&T and MCI WorldCom claim that Ameritech's "Loop Installation Factors" do not pass a common sense test. This claim is nonsense. The analysis that underlies this claim turns the evidence upside down. Ameritech's loop installation factors quantify statewide, average directly assigned telephone company labor and engineering, vendor installation, engineering and miscellaneous charges such as surveys and appraisals, exempt material, short and long term rentals of tools and other work equipment, and easement purchases for locating outside plant. The loop installation factors are applied against forward-looking, non-exempt outside plant materials including any applicable sales taxes and supply expenses. The bottom line is that Ameritech's loop installation factors capture the actual, forward-looking capitalized costs that Ameritech faces in doing real outside plant jobs. While the loop installation factors cannot be directly used in the synthesis model, the inputs for copper cable costs used in the model should be subject to a reality test based on the loop installation factors. Specifically, the relationship between total installed cost of copper cables and their material costs used in the model should be similar to the loop installation factors. If the proposed copper cable inputs do not pass muster, as apparently is the case for the copper cable inputs proposed by AT&T and MCI WorldCom, then such inputs do not adequately capture the consequences faced by an efficient firm building copper cable facilities in the real world.¹⁰ Consequently, the real world experience as reflected in Ameritech's loop installation factors means that AT&T's and MCI

¹⁰ For example, AT&T's and MCI WorldCom's consultants recommend a splicing rate that is five to ten times faster than the average splicing time realized by Ameritech using state of the art splicing procedures and a highly trained and experienced work force.

WorldCom's proposed copper cable inputs seriously understate installation costs, and should not be used in the synthesis model without significant revisions.

AT&T and MCI WorldCom at page 22 claim that "the Commission properly rejected Ameritech's argument that fill factors should be set on the basis of existing fill levels." However, Ameritech has not made this argument.¹¹ Instead, Ameritech has explained the standard engineering practice of building distribution facilities for "ultimate" demand, rather than current demand. The Commission's tentative conclusion at paragraph 100 of the FNPRM to use fill factors based on current demand is consistent with Ameritech's forward-looking fill factors. Also, these fill factors are consistent with the Commission's proposed distribution and feeder copper fill factors.

V. CONCLUSION

The Commission has spent at least three years selecting the synthesis model and its inputs. Many parties, including Ameritech, have identified significant weakness that still remain in the proposed inputs for the synthesis model. Elsewhere, Ameritech has questioned the wisdom of continuing with the development of the synthesis model as part of the federal universal service support mechanism.¹² However, if the Commission decides to continue pursuing the synthesis

¹¹ In an ex parte meeting on March 24, 1999, Ameritech representatives said that Ameritech designs distribution plant to meet "ultimate" demand and designs feeder plant that is "growable." See Letter from Celia Nogales, Ameritech, to Magalie Roman Salas, FCC, dated March 25, 1999.

¹² See Comments of Ameritech, filed on July 23, 1999 in the Matter of Federal-State Joint Board on Universal Service, Access Charge Reform, CC Docket Nos. 96-45 and 96-262, Seventh Report and Order and Thirteenth Order on Reconsideration and CC Docket No. 96-45, Fourth Report and Order in CC Docket No. 96-252, and Further Notice of proposed Rulemaking, FCC 99-119, released May 28, 1999.

model, the Commission should rely upon "the use of data based upon real world experience, and shun the use of algorithms and surveys where more accurate data is available."¹³

Respectfully submitted,

A handwritten signature in cursive script that reads "Larry A. Peck". The signature is written in black ink and is positioned above the typed name and address.

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Dated: August 6, 1999

¹³ Reply Comments of Ameritech to Further Notice of Proposed Rulemaking, filed August 18, 1997, p. 10.

CERTIFICATE OF SERVICE

I, Grace Germain, do hereby certify that a copy of the Reply Comments of Ameritech has been served on all parties of record, via first class mail, postage prepaid, on this 6thth day of August, 1999.

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